

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<p>In re:</p> <p>Pack Liquidating, LLC, <i>et al.</i>,¹</p> <p style="text-align: right;">Debtors.</p>	<p>Chapter 11</p> <p>22-10797 (CTG)</p> <p>(Jointly Administered)</p>
<p>Official Committee of Unsecured Creditors of Pack Liquidating, LLC, <i>et al.</i>, derivatively, on behalf of the Debtors’ estates,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>Amazon Web Services, Inc.,</p> <p style="text-align: right;">Defendant.</p>	<p>Adv. No. 23-50500</p>

**STIPULATION FOR EXTENSION OF TIME TO SERVE WRITTEN DISCOVERY AND
RESPOND TO DISCOVERY**

The Official Committee of Unsecured Creditors (the “Committee” or “Plaintiff”) of Pack Liquidating, LLC, *et al.*, derivatively, on behalf of the debtors and debtors-in-possession in the above-captioned bankruptcy proceedings (collectively, the “Debtors”), and Amazon Web Services, Inc. (the “Defendant” and, together with Plaintiff, the “Parties”), through their respective counsel, enter into this *Stipulation for Extension of Time to Serve Written Discovery and Respond to Discovery* (the “Stipulation”) and hereby stipulate and agree as follows:

1. On November 8, 2023, the Court entered the *Order Establishing Streamlined Procedures Governing Adversary Proceedings with Total in Controversy Greater than \$75,000 Brought by Plaintiff Pursuant to Sections 502, 547, 548, 549 and 550 of the Bankruptcy Code* (the

¹ The Debtors in these chapter 11 cases are: Pack Liquidating, LLC; GV Liquidating LLC; PM Liquidating, LLC; PP Liquidating, LLC; PV Liquidating, LLC; and AB Liquidating, LLC.

“Procedures Order”), which Procedures Order controls the deadlines applicable to the above-captioned adversary proceeding.

2. Paragraph 7 of the Procedures Order states in pertinent part that “all written interrogatories, document requests and requests for admission, if any, must be served upon the adverse party no later than January 31, 2024.”

3. Paragraphs 8, 9, and 10 state in pertinent part that “[r]esponses to interrogatories,” “[d]ocument production and responses to document requests,” and [r]esponses to requests for admission are due 60 days after service.”

4. Paragraph 43 of the Procedures Order states that “The deadlines and/or provisions contained in the Procedures Order may be extended and/or modified by the Court upon written motion and for good cause shown or consent of the parties pursuant to stipulation, which stipulation needs to be filed with the Court....”

5. On December 11, 2023, Plaintiff served its First Set of Interrogatories, Requests for Production, and Requests for Admission Propounded by Plaintiff (“Plaintiff’s First Set of Discovery Requests”). Under the Procedures Order, Amazon’s document production and responses to Plaintiff’s First Set of Discovery Requests are due February 9, 2024.

6. The Parties agree and stipulate that the time within which the Parties must serve written interrogatories, document requests and requests for admission is hereby further extended to and including February 29, 2024.

7. The Parties agree and stipulate that the time within which Amazon must serve its document production and responses to Plaintiff’s First Set of Discovery Requests is hereby further extended to and including March 11, 2024.

8. Defendant admits that Defendant is the proper party defendant as named in the Summons and Complaint.

9. In exchange for Plaintiff's agreement to extend the written discovery deadline and deadline to respond to Plaintiff's First Set of Discovery Requests, Defendant agrees to waive any issues relating to service of process of the Summons and Complaint.

Dated: January 31, 2024

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A.M. SACCULLO LEGAL, LLC

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